

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA**

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS CHRONICLE,
THEHUFFINGTONPOST, INC.,
REPRESENTATIVE STEVE COHEN,
US DOMINION, INC., DOMINION VOTING
SYSTEMS, INC., DOMINION VOTING
SYSTEMS CORPORATION, MEDIA
MATTERS FOR AMERICA, OHIO
INTELLIGENCE TIPS, ROSS ELDER,
and ALI ABDUL RAZAQ AKBAR A/K/A
ALI ALEXANDER,

Defendants.

Civil Action No. 1:21-cv-317

Judge Clifton L Corker
Magistrate Judge Christopher H Steger

DOMINION’S MOTION TO DISMISS

Pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendants U.S. Dominion, Inc., Dominion Voting Systems, Inc., and Dominion Voting Systems Corporation (sometimes collectively, “Dominion”) move the Court for an Order dismissing the Amended Verified Complaint (“Complaint”) of Plaintiff Terpsehore Maras (“Plaintiff”) against them on the grounds that (1) the Court does not have personal jurisdiction over Dominion and (2) Plaintiff has failed to state a claim against Dominion upon which relief can be granted.¹ In support of this motion, Dominion relies on its Memorandum of Law and the Declarations of Nicole

¹ Plaintiff’s Complaint was filed on November 29, 2021 in the Hamilton County Circuit Court (although Plaintiff’s Complaint is erroneously captioned as having been filed in the Hamilton County Chancery Court). (Dkt. No. 1-2). Plaintiff’s Complaint was removed to this Court on December 27, 2021 by Defendant Steve Cohen. (Dkt. No. 1). Pursuant to the Court’s Order dated December 27, 2021, all defendants who previously had been served with Plaintiff’s Complaint, which included Dominion, were granted an extension to respond to January 21, 2022. (Dkt. No. 9).

Nollette and Megan L. Meier, all filed concurrently herewith.

Respectfully submitted,

/s/ W. Scott Sims

W. Scott Sims (#17563)

Michael R. O' Neill (#34982)

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Counsel for Dominion Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2022, a copy of the foregoing was filed via the Court's CM/ECF system which will send notice of this filing via electronic mail notice to the following:

Russell A. Newman The Newman Law Firm 6688 Nolensville Road Suite 108-22 Brentwood, TN 37027 russell@thenewmanlawfirm.com	Todd Tatelman Sarah Clouse United States House of Representatives, General Counsel 219 Cannon House Office Building Washington, DC 20515 202-225-9700 todd.tatelman@mail.house.gov sarah.clouse@mail.house.gov
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And sent via U.S. Mail to the following:

MEDIA MATTERS FOR AMERICA 75 Broadway Street, Suite 202 San Francisco, CA 94111	ALI ABDUL RAZAQ AKBAR A/K/A ALI ALEXANDER 5125 Pinellas Avenue Keller, TX 76244
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/s/ W. Scott Sims

W. Scott Sims